



MURIEL GOODE-TRUFANT  
Acting Corporation Counsel

This request is GRANTED. The Conference shall be held on **Wednesday, August 28th at 12 pm.**

SO ORDERED.

*Jennifer E. Willis*

Jennifer E. Willis  
United States Magistrate Judge

August 22, 2024

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Not For Service

**Via ECF**

Hon. Jennifer E. Willis  
United States Magistrate Judge  
United States District Court, Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: *Local 3621, EMS Officers Union, DC-37, AFSCME, AFL-CIO v. City of New York et al.*  
No. 18-cv-4476 (LJL) (JW)

Dear Judge Willis:

I am an Assistant Corporation Counsel in the Office of Muriel Goode-Trufant, Acting Corporation Counsel of the City of New York, attorney for Defendants in the above-referenced matter. I write pursuant to Paragraph I.C of Your Honor's Individual Rules and Practices in Civil Cases, to request a brief adjournment of the conference, scheduled for August 23, 2024 at 12:00 p.m., to Monday, August 26th, Tuesday, August 27th, or Wednesday, August 28th.

I request this adjournment because I have pre-scheduled obligations related to preparation for a jury trial currently scheduled to begin in *Hanley v. New York City Health & Hospitals Corporation, et al.*, No. 19-CV-4246 (FB)(SJB), before Judge Frederic Block in the Eastern District of New York on September 16, 2024. Further, the other attorney for Defendants, Bryan Carr Olert, has a deposition scheduled on August 23rd, at the same time as the conference scheduled in this case, that has already been adjourned and cannot be adjourned again. Both counsel for Defendants are out of the office, and not able to attend a conference, on Thursday, August 29th and Friday, August 30th.

This is Defendants' first request for an adjournment of the August 23, 2024 conference. Plaintiffs' position is as follows: "Plaintiffs would consent to the extension of the August 23, 2024 conference if Defendants requested a received a corresponding extension of the October 11, 2024 deadline. Otherwise, given the deadline set by parties to complete production by August 26, 2024 which is three days after the conference, and Judge Liman's recent order setting motion deadlines of October 11, 2024 we cannot agree to an extension of the conference."

Accordingly, Defendants respectfully request that the August 23rd conference be adjourned to August 26th, 27th, or 28th.

Respectfully Submitted,

/s/

Laura C. Williams  
Assistant Corporation Counsel

cc: All parties via ECF